

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

CLAUDIA LANIER,

Plaintiff,

vs.

WACHOVIA BANK,

Defendant.

Civil Action No. 2:09-cv-4566

VERIFIED STATEMENT OF JANA PEARSON

I, Jana Pearson, verify that the statements made in this Verified Statement, pursuant to 28 U.S.C. § 1746, are true and correct to the best of my knowledge and belief. I understand that false statements made herein are subject to the penalties of perjury and state as follows:


1. I am employed as a Paralegal in the Wells Fargo law department. I submit this Verified Statement in opposition to plaintiff's Motion for Remand.

2. Defendant Wachovia Bank is a national banking organization and a federally-chartered bank whose main office, as set forth in its articles of association, is in Charlotte, North Carolina. Wachovia Bank is a wholly-owned subsidiary of Wachovia Corporation (a Delaware Corporation), which in turn is a wholly-owned subsidiary of Wells Fargo & Company (a Delaware Corporation).

3. Wells Fargo Bank is a separate legal entity from Wachovia Bank and has not been named as a defendant in this lawsuit.

4. To my knowledge and based upon my investigation, Plaintiff never previously served Wachovia Bank with her Motion to Cease and Desist and Payback, a copy of which purports to be attached to the Motion to Remand as Exhibit A.

I verify under penalty of perjury that the foregoing is true and correct. Executed on November 2nd, 2009.


Jana Pearson

Dated: November 2, 2009